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BY ECF

Honorable Brian M. Cogan
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Shaw-Nae Dixon at al. v. Bill De Blasio, et al., Civil Case No. 21-cv-5090

Dear Judge Cogan:

We are attorneys in the office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, counsel for defendants in the above-referenced action. Defendants respectfully request that their time to respond to Plaintiffs' motion to amend the complaint be extended from July 20th by three weeks to August 10th.

Defendants seek the extension due to other impending deadlines as well as the fact that Plaintiffs' amended complaint now seeks to challenge every Covid related restriction issued by Mayor Bill DeBlasio and Mayor Eric Adams through emergency executive orders. Given these new claims, Defendants need additional time to address each of these in its response to Plaintiff's motion.

This is the Defendants' first request for an extension of time respond to Plaintiff's motion to amend the complaint. We have reached out to Plaintiffs' counsel and he does not consent to this extension because the City did not consent to his last request for an extension. Currently, there are no scheduled Court dates in this action.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ Jasmine Paul and Kerri Devine
Jasmine Paul and Kerri Devine
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cc: Ronald A. Berutti, Esq. (by ECF)
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